



Re: A Question----Re: Your PSD Presentation at MARAMA 

Himanshu Vyas to: Umesh Dholakia

11/26/2012 02:39 PM

From: Himanshu Vyas/R3/USEPA/US
To: Umesh Dholakia/R2/USEPA/US@EPA

Hi Umesh,

Sorry to respond so late; didn't mean to ignore your email but I was really quite busy in the short week last week.

To answer your question, you may find clarifications in the memo to Northhampton generating, the link to which is below:

<http://www.epa.gov/region07/air/nsr/nsrmemos/psdanalysis.pdf>

You are not supposed to take the maximum design capacity before the project as the "CHA" emissions, because that capacity naturally dwindles and often the very reason to do a project is to regain that lost capacity. In other words, the "Could have accommodated" emissions are those that the company could have achieved in the normal course of operations and without the need for the project at hand.

As to whether you can have the 10-year look back or 5-year look back, the difference is laid out in 52.21 and relies on whether the project is at an EGU or not.

Hope that helps.

Himanshu Vyas
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Umesh Dholakia

Thanks. Please take a look at Slide 12 (Post Ch...

11/21/2012 10:40:32 AM

From: Umesh Dholakia/R2/USEPA/US
To: Himanshu Vyas/R3/USEPA/US@EPA
Date: 11/21/2012 10:40 AM
Subject: A Question----Re: Your PSD Presentation at MARAMA

Thanks.

Please take a look at Slide 12 (Post Change_EmissionsStep1)- it states that the Highest Monthly Productions Rate....achieved in 24-month baseline period...3600 pcs/mo--then we have to convert it to yearly "could have achieved" rate.....or "could have accommodated " rate-- Is there any guidance memo or applicability letter describing this approach to figure out "could have achieved" rate? Some say that it could be any year in last 10 years- some say that whatever is the design capacity is "could have achieved" (50,000 pcs in your case).....

I have a case where design capacity is 650,000 t/y--but produced 580,000 t/y average due to lack of demand- now after change- they say that they could have achieved 650,000 rate...so give me credit!

Umesh

Himanshu Vyas	Here are the presentations we have given recent...	11/21/2012 10:02:08 AM
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From: Himanshu Vyas/R3/USEPA/US
To: Umesh Dholakia/R2/USEPA/US@EPA
Date: 11/21/2012 10:02 AM
Subject: Re: Your PSD Presentation at MARAMA

Here are the presentations we have given recently:

[attachment "Baseline Actual Emissions-3-26-12.pptx" deleted by Umesh Dholakia/R2/USEPA/US]

[attachment "2b - Post_change_emissionsStep1.ppt" deleted by Umesh Dholakia/R2/USEPA/US]

[attachment "3 - Step 2.pptx" deleted by Umesh Dholakia/R2/USEPA/US]

Hope this helps.

Himanshu Vyas
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Umesh Dholakia	Hi! Himanshu: Will you please send me your PS...	11/21/2012 09:56:52 AM
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From: Umesh Dholakia/R2/USEPA/US
To: Himanshu Vyas/R3/USEPA/US@EPA
Date: 11/21/2012 09:56 AM
Subject: Your PSD Presentation at MARAMA

Hi! Himanshu:

Will you please send me your PSD presentation- the one I saw stopped at BAE-Step 1...and stated further info will be in the next presentation- which I did not see (on Google). Please send me both presentations--Thanks.

Umesh

PAE: Part IV – What to Exclude



- When calculating the increase in emissions resulting from the project, EXCLUDE:
 - That portion of the projected actual emissions that the unit could have physically and legally emitted during the baseline period (the 24 month period used in calculating BAE);
 - AND that are unrelated to the particular project, including any increased activity level (utilization) that could have been achieved during the baseline period.
- Remember to keep the end in mind! You are trying to capture the actual emissions increase due to the project.

